



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Date provided in electronic signature below

Jim Abbott
Director of Warehouse
Jim.abbott@natdcp.com
National DCP, LLC
150 Depot Street
Bellingham, MA 02019

Re: Notice of Noncompliance Regarding the Chemical Accident Prevention Requirements of the Clean Air Act for the National DCP, LLC Facility at 150 Depot Street, Bellingham, MA 02019

Dear Mr. Abbott:

On July 9, 2021, representatives of the United States Environmental Protection Agency (EPA) conducted an inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance of National DCP, LLC with the Chemical Accident Prevention Provisions of Section 112(r)(7) of the Clean Air Act, 42 U.S.C. § 7412(r)(7). Additionally, the inspection evaluated National DCP's compliance with the chemical accident prevention and mitigation requirements of Section 112(r)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7412(r)(1), otherwise known as the General Duty Clause.

Pursuant to the General Duty Clause, owners and operators of stationary sources producing, processing, handling, or storing substances listed pursuant to Section 112(r)(3) of the CAA, 42 U.S.C. § 7412(r)(3), or any other extremely hazardous substance, have a general duty, in the same manner and to the same extent as 29 U.S.C. § 654, to (a) identify hazards which may result from accidental release of substances using appropriate hazard assessment techniques; (b) design and maintain a safe facility taking such steps as are necessary to prevent releases; and (c) minimize the consequences of accidental releases which do occur.

Following EPA's inspection, a summary of compliance measures that were taken in response to concerns identified during the inspection were submitted. This letter is to confirm that EPA has reviewed all the information you have submitted in response to the July 9, 2021, inspection.

Based upon EPA's inspection of your facility on July 9, 2021, and a review of other information that the Facility had subsequently provided, EPA has determined that at the time of the inspection, National DCP failed to meet all the requirements of the General Duty Clause's

chemical accident prevention and mitigation requirements of Section 112(r)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7412(r)(1). Specifically, the National DCP Facility did not have the basic core requirements of the General Duty Clause regulations, including developing and maintaining a Process Hazard Review and designing and maintaining a safe facility. Notice is hereby given that the National DCP facility failed to meet the requirements of Section 112(r) of the CAA.

Since the July 9, 2021, EPA inspection, representatives from your facility have demonstrated that all violations observed during the inspection have been addressed. Please confirm that the facility has maintained compliance upon receipt of this Notice of Noncompliance by contacting Len Wallace of EPA Region 1 using the provided information below:

Leonard Wallace, EPA Inspector
Waste & Chemical Compliance Section
Enforcement & Compliance Assurance Division
5 Post Office Square Suite 100, Mail Code: 05
Boston, MA 02109-3912
Wallace.Len@epa.gov

If you have any questions concerning this Notice of Noncompliance or regarding Section 112(r) of the CAA, please contact Len Wallace via email.

Sincerely,

JAMES CHOW

Digitally signed by JAMES
CHOW
Date: 2025.03.17 12:24:50
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James Chow, Director
Environmental Compliance and Enforcement Division
USEPA, Region 1

cc: Len Wallace, USEPA, Region 1
Mary Jane O'Donnell, USEPA Region 1